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Ocean Valley Behavioral Health, LLC, Rodeo  
Recovery LLC, Sunset Rehab LLC, Natural  
Rest House, Inc., 55 Silver LLC, 9 Silver LLC,  
Helping Hands Rehabilitation Clinic Inc., and  
Joser Forever LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

AETNA LIFE INSURANCE COMPANY,  
AETNA HEALTH OF CALIFORNIA,  
INC.,

Plaintiffs,

v.

NATHAN SAMUEL YOUNG a/k/a  
PABLO LOPEZ; DAVID YOUNG a/k/a  
SANCHO LOPEZ; JOSE RICARDO  
TOSCANO MALDONADO; ALI  
BEHESHTI; MARC ADLER; ANI  
MIRZAVAN; ZEALIE LLC; HELPING  
HANDS REHABILITATION CLINIC  
INC; JOSER FOREVER LLC; GET  
REAL RECOVERY LLC; REVIVE  
PREMIER TREATMENT CENTER,  
INC.; HEALING PATH DETOX LLC;  
OCEAN VALLEY BEHAVIORAL  
HEALTH, LLC; RODEO RECOVERY  
LLC; SUNSET REHAB LLC;  
NATURAL REST HOUSE, INC; 55  
SILVER LLC; 9 SILVER LLC; JOHN

Case No. 2:23-cv-09654-MCS-JPR

**DECLARATION OF MARC S.  
WILLIAMS IN SUPPORT OF  
COUNTERCLAIMANTS GET REAL  
RECOVERY INC., HEALING PATH  
DETOX LLC, OCEAN VALLEY  
BEHAVIORAL HEALTH LLC,  
SUNSET REHAB LLC, HELPING  
HANDS REHABILITATION CLINIC  
INC., AND JOSER FOREVER LLC'S  
OPPOSITION TO AETNA LIFE  
INSURANCE COMPANY, AETNA  
HEALTH OF CALIFORNIA INC.,  
AND DAVID ERICKSON'S MOTION  
TO DISMISS THE  
COUNTERCLAIMS**

*Filed concurrently with Counterclaimants'  
Opposition*

Judge: Honorable Mark C. Scarsi  
Hearing Date: March 3, 2025  
Time: 9:00 a.m.

DOES 1 THROUGH 50; AND ABC  
CORPS. 1-50,  
Defendants.

Place: First Street Courthouse,  
Courtroom 7C  
Complaint Filed: November 14, 2023  
Trial Date: May 5, 2026

GET REAL RECOVERY LLC;  
HEALING PATH DETOX LLC; OCEAN  
VALLEY BEHAVIORAL HEALTH,  
LLC; SUNSET REHAB LLC; HELPING  
HANDS REHABILITATION CLINIC,  
INC.; AND JOSER FOREVER LLC,

Counterclaimants.

v.

AETNA LIFE INSURANCE  
COMPANY; AETNA HEALTH OF  
CALIFORNIA, INC.; DAVID  
ERICKSON; ROES 1-10,

Counterdefendants.

COHEN WILLIAMS<sub>LLP</sub>

**DECLARATION OF MARC S. WILLIAMS**

I, Marc S. Williams, declare as follows:

1. I am over the age of eighteen and am an attorney duly licensed to practice law in the State of California. I am a partner with Cohen Williams LLP and attorney of record for Counterclaimants Get Real Recovery, Inc., Healing Path Detox LLC, Ocean Valley Behavioral Health, LLC, Sunset Rehab LLC, Helping Hands Rehabilitation Clinic Inc., and Joser Forever LLC (collectively, “Providers”) in this action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify regarding those matters.

2. I make this Declaration in support of Providers’ Opposition to Aetna Life Insurance Company, Aetna Health of California Inc., and David Erickson’s (collectively “Aetna”) Motion to Dismiss the Counterclaims.

3. On January 9, 2025, I emailed counsel for Aetna pursuant to ongoing meet and confer efforts and voluntarily provided to Aetna two representative Assignment of Benefits forms applicable to unpaid insurance claims that are the subject of the Counterclaims. I also requested that Aetna share plan documents implicated by the claims in Aetna’s First Amended Complaint. I attach a true and correct copy of this email thread as **Exhibit A**.

4. On January 10, 2025, counsel for Aetna responded to my email without addressing my request for plan documents. I attach a true and correct copy of this response as **Exhibit B**.

5. On the same date, my colleague Yusuf Saei confirmed for Aetna that the assignments we provided were signed by patients listed in our counterclaim exhibits, and asked Aetna to provide its response to our requests for plan documents. I attach a true and correct copy of this response as **Exhibit C**.

6. Aetna never responded to my request that it share plan documents and instead filed its Motion to Dismiss the Counterclaims, which attached and selectively

disclosed to Providers for the first time a Summary Plan Description for an Amazon plan. ECF 86-6.

7. Aetna did not attach other plan documents, such as the Evidence of Coverage (“EOC”), which would typically include the rates at which Aetna is required to reimburse out-of-network providers under the plan.

8. On January 28, 2025, concurrently with Providers’ initial disclosures, Providers sent Aetna’s counsel an email attaching more than 160 additional Assignment of Benefits forms for the enrollees that are the subject of the Counterclaims. I attach a true and correct copy of this email thread (without the attached Assignment of Benefits themselves) as **Exhibit D**.

9. In the January 28, 2025 email, Providers requested again that Aetna disclose “plan documents” for the enrollees who had completed Assignment of Benefit forms, “including documents sufficient to ascertain the plan type (e.g. employer sponsored), the extent of MH/SUD treatment coverage at all levels of care, and corresponding reimbursement rates for out-of-contract providers (e.g. 125% of medicare).” *Id.*

10. On January 31, 2025, Providers again requested if Aetna would provide plan documents as requested. *Id.*

11. Aetna did not respond until February 3, 2025, at which time it refused to provide plan documents without an official discovery request, notwithstanding its initial disclosure obligations. *Id.*

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ *Marc S. Williams*

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DECLARATION OF MARC S. WILLIAMS ISO OPPOSITION TO MOTION TO DISMISS THE COUNTERCLAIMS